

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

CW, et al.,)	
)	
Plaintiffs,)	
v.)	CASE NO. 3:10-cv-00087-PPS-CAN
)	
TEXTRON, INC.,)	
)	
Defendant.)	

MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Defendant, Textron, Inc., by counsel, respectfully requests leave to file under seal certain exhibits to its Motion for Leave to Supplement Motions to Exclude Opinions and Testimony of Certain of Plaintiffs' Experts and to Supplement its Response to Plaintiffs' Motion to Exclude Dr. Weinraub (Dkt. 217). Textron filed this Motion on February 26, 2013 with several exhibits as attachments, but did not request that any exhibits be placed under seal. Textron believes that the following exhibits to the Motion should be filed under seal:

Exhibit A – Supplemental Expert Report of Dr. Scott Phillips (Doc. No. 217-1)

Exhibit B - Supplemental Expert Report of Dr. H. James Wedner (Doc. No. 217-2)

Exhibit F - Excerpts of deposition of Jennifer Richter, June 28, 2012 (Doc. No. 217-6)

Exhibit G - Excerpts of deposition of Jerrod Feldman, M.D., October 31, 2012 (Doc. No. 217-7)

Exhibit H - Affidavit of Jerrod Feldman, M.D., dated August 31, 2012 (Doc. No. 217-8)

Exhibit I - Excerpts of deposition of Stephanie Rensberger, November 9, 2012 (Doc. No. 217-9)

These exhibits should be filed under seal because they disclose the names of minors.

Because good cause exists to file these exhibits under seal, Textron respectfully requests leave to do so.

Respectfully submitted,

/s/ Frank J. Deveau

Frank J. Deveau

Michael D. Chambers

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of February, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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